

<p style="text-align: center;">Page 1</p> <p style="text-align: center;">UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF INDIANA FORT WAYNE DIVISION</p> <p>RYAN KLAASSEN, JAIME CARINI,) D.J.B., by and through his) next friend and father,) DANIEL G. BAUMGARTNER,) ASHLEE MORRIS, SETH CROWDER,) MACEY POLICKA, MARGARET ROTH,) and NATALIE SPERAZZA,)) Plaintiffs,)) CASE NO. -vs-) 1:21-cv-00238) THE TRUSTEES OF INDIANA) UNIVERSITY,)) Defendant.)</p> <p style="text-align: center;">DEPOSITION OF NATALIE GRACE SPERAZZA July 1, 2021</p> <p>Remote oral deposition of NATALIE GRACE SPERAZZA, commencing at 10:59 a.m., on the above date, before CORINNE T. MARUT, C.S.R. No. 84-1968, Registered Professional Reporter, Certified Realtime Reporter and Notary Public.</p> <p style="text-align: center;">GOLKOW LITIGATION SERVICES 877.370.3377 ph / 917.591.5672 fax deps@golkow.com</p>	<p style="text-align: center;">Page 2</p> <p>1 APPEARANCES All Parties Appearing Via Zoom Videoconference</p> <p>2</p> <p>3 ON BEHALF OF THE PLAINTIFFS: 4 THE BOPP LAW FIRM 1 South 6th Street 5 Terre Haute, Indiana 47807 812-232-2434 6 BY: MELENA S. SIEBERT, ESQ. msiebert@bopplaw.com</p> <p>7</p> <p>8</p> <p>9</p> <p>10 ON BEHALF OF THE DEFENDANT: 11 FAEGRE DRINKER BIDDLE & REATH LLP 300 North Meridian Street, Suite 2500 12 Indianapolis, Indiana 46204 317-237-0300 13 BY: ANNE K. RICCHIUTO, ESQ. anne.ricchiuto@faegredrinker.com 14 STEPHANIE GUTWEIN, ESQ. stephanie.gutwein@faegredrinker.com</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19 REPORTED BY: CORINNE T. MARUT, C.S.R. No. 84-1968 20 21 22 23 24</p>
<p style="text-align: center;">Page 3</p> <p>1 INDEX 2 NATALIE GRACE SPERAZZA EXAMINATION 3 BY MS. RICCHIUTO..... 4 BY MS. SIEBERT..... 48 4 BY MS. RICCHIUTO..... 60 BY MS. SIEBERT..... 66 5 BY MS. RICCHIUTO..... 67 6 7 8</p> <p style="text-align: center;">EXHIBITS</p> <p>9 SPERAZZA DEPOSITION EXHIBIT MARKED FOR ID 10 No. 1 Verified Complaint for 14 11 Declaratory and Injunctive 12 Relief 13 14 15 16 17 18 19 20 21 22 23 24</p>	<p style="text-align: center;">Page 4</p> <p>1 THE REPORTER: All parties to this deposition 2 are appearing remotely and have agreed to the 3 witness being sworn in remotely. 4 Due to the nature of remote reporting, 5 please pause briefly before speaking to ensure all 6 parties are heard completely. 7 Counsel will be noted on the 8 stenographic record. 9 Counsel, do you so stipulate to the 10 remote swearing in of the witness? 11 MS. SIEBERT: Plaintiffs' counsel does. 12 MS. RICCHIUTO: IU does. 13 (WHEREUPON, the witness was duly 14 sworn.) 15 NATALIE GRACE SPERAZZA, 16 called as a witness herein, having been first duly 17 sworn, was examined and testified as follows: 18 EXAMINATION 19 BY MS. RICCHIUTO: 20 Q. Hi, Natalie. My name is Anne Ricchiuto. 21 I'm a lawyer for IU, and I am defending IU in this 22 lawsuit. 23 Before we start asking some questions, I 24 just want to put a couple more kind of technical</p>

EXHIBIT

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<p style="text-align: right;">Page 5</p> <p>1 caveats on the record today.</p> <p>2 If you have any issues with your sound</p> <p>3 or your video or if I do or the reporter does or</p> <p>4 your lawyer does, we will all take a break and get</p> <p>5 back together just as soon as we can to make sure</p> <p>6 that nobody misses anything. We want to make sure</p> <p>7 that we stay connected. And we have had good luck</p> <p>8 so far. So, hopefully today will be smooth just</p> <p>9 like that.</p> <p>10 Is there anybody in the room with you,</p> <p>11 Natalie?</p> <p>12 A. No.</p> <p>13 Q. Okay. If you at any point want to talk</p> <p>14 to your lawyer or communicate with someone else,</p> <p>15 you may be able to do that, but I just need you to</p> <p>16 let me know.</p> <p>17 And I'm going to ask that while we are</p> <p>18 in the deposition you won't be, for example,</p> <p>19 texting or instant messaging or communicating with</p> <p>20 anyone else. Do you agree to that?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. Have you ever had your deposition</p> <p>23 taken before?</p> <p>24 A. No, I haven't.</p>	<p style="text-align: right;">Page 6</p> <p>1 Q. Okay. So, let me just briefly go over</p> <p>2 the process. This deposition is IU's opportunity</p> <p>3 to just ask you some questions and understand a</p> <p>4 little bit more about your position in the lawsuit.</p> <p>5 You understand that you're under oath to testify</p> <p>6 truthfully today?</p> <p>7 A. Yes.</p> <p>8 Q. And I will be posing questions to you.</p> <p>9 If you don't understand my question, which</p> <p>10 sometimes happens, please let me know and I'll try</p> <p>11 to ask a better question. If you answer, then I</p> <p>12 will assume that you understood what I was asking.</p> <p>13 Do you have any notes with you today?</p> <p>14 A. No, I don't.</p> <p>15 Q. Okay. The only other thing to note</p> <p>16 about a deposition, because it's a little bit of an</p> <p>17 unusual format. When we're normally talking to one</p> <p>18 another, we can nod and shake our head and say</p> <p>19 things like uh-huh and uh-uh. That makes it really</p> <p>20 tough for the Court Reporter to get it down.</p> <p>21 So, we just need to make sure that we're</p> <p>22 answering each other audibly. And we can help each</p> <p>23 other if we accidentally nod. Melena and I will</p> <p>24 help you make sure that we get the record that we</p>
<p style="text-align: right;">Page 7</p> <p>1 need of what was said out loud.</p> <p>2 Your attorney may object to some of my</p> <p>3 questions. She's allowed to do that. That's</p> <p>4 perfectly fine. And in general you will still</p> <p>5 answer the question unless she instructs you not</p> <p>6 to. So, we can deal with that when it arises, but</p> <p>7 I just wanted to let you know that there could be</p> <p>8 some interruptions --</p> <p>9 A. Okay.</p> <p>10 Q. -- for objections.</p> <p>11 Will you state your full name for the</p> <p>12 record, Natalie.</p> <p>13 A. Natalie Grace Sperazza.</p> <p>14 Q. Is it okay with you if I call you</p> <p>15 Natalie during the deposition today?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. What did you do to prepare to</p> <p>18 have your deposition taken this morning?</p> <p>19 A. I read through my facts, and I just</p> <p>20 thought about like anything that you guys could be</p> <p>21 asking me.</p> <p>22 Q. Okay. Anything else that you did to</p> <p>23 prepare?</p> <p>24 A. I don't think so.</p>	<p style="text-align: right;">Page 8</p> <p>1 Q. Okay. Have you ever met or talked to</p> <p>2 any of the other Plaintiffs in the lawsuit?</p> <p>3 A. No.</p> <p>4 Q. How did you become involved in the</p> <p>5 lawsuit?</p> <p>6 A. Me and my family all decided we want to</p> <p>7 stand up for what's right.</p> <p>8 Q. And is your -- who do you have in mind</p> <p>9 when you say your family? Is it your parents or</p> <p>10 someone else?</p> <p>11 A. My parents.</p> <p>12 Q. How did you -- how did you become aware</p> <p>13 that there was an opportunity to sue IU?</p> <p>14 A. My mom found the law firm.</p> <p>15 Q. Do you know how she did that?</p> <p>16 A. I think just through social media.</p> <p>17 Q. Was she looking for a law firm to</p> <p>18 potentially sue IU or did she become aware of the</p> <p>19 lawsuit, if you know?</p> <p>20 A. I don't know for sure.</p> <p>21 Q. Tell me -- tell me just from your</p> <p>22 perspective what's the lawsuit about.</p> <p>23 A. It's about going against the mandates.</p> <p>24 Q. Okay. What are the mandates?</p>

<p style="text-align: right;">Page 9</p> <p>1 A. To get vaccinated to go to IU.</p> <p>2 Q. And what do you mean by going against</p> <p>3 them?</p> <p>4 A. Just refusing to get the vaccination in</p> <p>5 order to go to college.</p> <p>6 Q. Did you review -- anything else you want</p> <p>7 to tell me about your understanding of what the</p> <p>8 lawsuit is about?</p> <p>9 A. Can you rephrase the question?</p> <p>10 Q. Sure. I think you just told me that you</p> <p>11 are involved in the lawsuit because you -- well,</p> <p>12 no, that's probably not a fair -- that's not a fair</p> <p>13 characterization of what you told me.</p> <p>14 You want to challenge the fact that IU</p> <p>15 is requiring the vaccine to go to school. Is that</p> <p>16 accurate?</p> <p>17 A. Yes.</p> <p>18 Q. Is there any other basis for you being</p> <p>19 involved in this lawsuit?</p> <p>20 A. No.</p> <p>21 Q. Did you review the document that's</p> <p>22 called the Complaint in this case? It's the</p> <p>23 document that sort of starts the lawsuit on behalf</p> <p>24 of you and the other Plaintiffs.</p>	<p style="text-align: right;">Page 10</p> <p>1 A. Yes.</p> <p>2 Q. Did you -- do you know if you reviewed</p> <p>3 that before or after it was filed?</p> <p>4 A. Before and after.</p> <p>5 Q. Do you remember signing a verification</p> <p>6 page?</p> <p>7 A. Yes.</p> <p>8 Q. And what's your understanding of what</p> <p>9 that verification page does?</p> <p>10 A. My understanding is it verifies that all</p> <p>11 of the facts in my Complaint were correct.</p> <p>12 Q. All the facts in the whole Complaint or</p> <p>13 just the facts that are about you?</p> <p>14 A. About me.</p> <p>15 Q. And that's your signature, you signed</p> <p>16 the verification?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. You are -- do I have it right</p> <p>19 that you an incoming sophomore?</p> <p>20 A. Yes.</p> <p>21 Q. I'm sorry. Let me back up. Just one</p> <p>22 other question.</p> <p>23 Do you recall if you signed that</p> <p>24 verification before or after you read the</p>
<p style="text-align: right;">Page 11</p> <p>1 Complaint?</p> <p>2 A. After.</p> <p>3 Q. Okay. So, you're an incoming sophomore.</p> <p>4 Have you registered for classes for the fall?</p> <p>5 A. Yes.</p> <p>6 Q. What campus do you go to?</p> <p>7 A. I'm a transfer student from IU</p> <p>8 Bloomington to IUPUI.</p> <p>9 Q. So, you attended IU Bloomington for your</p> <p>10 freshman year, is that right?</p> <p>11 A. Yes.</p> <p>12 Q. And you will be attending in</p> <p>13 Indianapolis starting in August?</p> <p>14 A. Yes.</p> <p>15 Q. Are you going to be living on campus?</p> <p>16 A. No.</p> <p>17 Q. Are the classes that you've registered</p> <p>18 for, are they in-person classes?</p> <p>19 A. Yes.</p> <p>20 Q. How many classes will you be taking this</p> <p>21 fall?</p> <p>22 A. Five.</p> <p>23 Q. Tell me about your experience. Did you</p> <p>24 live on campus last year when you were at</p>	<p style="text-align: right;">Page 12</p> <p>1 Bloomington your freshman year?</p> <p>2 A. I lived on campus until early November,</p> <p>3 and then I moved home for the rest of the year.</p> <p>4 Q. Was there a reason that you decided to</p> <p>5 do that?</p> <p>6 A. Yes. All my classes were online.</p> <p>7 Q. Were they online starting in August for</p> <p>8 the whole year?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. So, it sounds like you moved to</p> <p>11 Bloomington for a while and then decided "I might</p> <p>12 as well just do my classes from home"?</p> <p>13 A. Yes. That's what happened.</p> <p>14 Q. Are you planning to continue living at</p> <p>15 home this fall?</p> <p>16 A. Yes.</p> <p>17 Q. Is home somewhere that you live with</p> <p>18 other people or you live by yourself?</p> <p>19 A. I live with my parents and my sister.</p> <p>20 Q. Is your sister older or younger?</p> <p>21 A. Younger.</p> <p>22 Q. Bet she's happy to have you stay home.</p> <p>23 Natalie, have you been vaccinated for</p> <p>24 COVID-19?</p>

<p style="text-align: right;">Page 13</p> <p>1 A. No.</p> <p>2 Q. Do you have any plans to get vaccinated?</p> <p>3 A. No.</p> <p>4 Q. What have you been up to this summer</p> <p>5 since school got out in May?</p> <p>6 A. I've been working a lot. I have my job.</p> <p>7 Q. What's your job?</p> <p>8 A. I work at Marshalls.</p> <p>9 Q. At your job are you required to take any</p> <p>10 precautions related to COVID-19?</p> <p>11 A. Yes.</p> <p>12 Q. What are they?</p> <p>13 A. We have to wear face masks.</p> <p>14 Q. Is that at all times while you're at</p> <p>15 work?</p> <p>16 A. Yes.</p> <p>17 Q. You said you've been working a lot. How</p> <p>18 many hours a week are you working at Marshalls this</p> <p>19 summer?</p> <p>20 A. About 40 hours a week.</p> <p>21 Q. And are you compliant with that</p> <p>22 requirement that you wear a mask while you're</p> <p>23 working at Marshalls?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 14</p> <p>1 Q. I'm going to show you -- do you have the</p> <p>2 link? We should have covered this earlier,</p> <p>3 Natalie.</p> <p>4 Do you have a link that you could pull</p> <p>5 up to look at a document with me?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. So, if you go in there, in just</p> <p>8 one second you should see -- okay.</p> <p>9 (WHEREUPON, Sperazza Deposition</p> <p>10 Exhibit No. 1 was marked for</p> <p>11 identification: Verified Complaint</p> <p>12 for Declaratory and Injunctive</p> <p>13 Relief.)</p> <p>14 BY MS. RICCHIUTO:</p> <p>15 Q. Do you a see that document that's the</p> <p>16 Complaint in this lawsuit? Are you able to see</p> <p>17 that?</p> <p>18 A. Yes, I see it.</p> <p>19 Q. Okay. Is this something -- is this a</p> <p>20 document that you have seen before?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. And I want to talk -- you're</p> <p>23 welcome to look at any part of the document that</p> <p>24 you want. The paragraphs I want to talk to you</p>
<p style="text-align: right;">Page 15</p> <p>1 about the most are on page 45.</p> <p>2 So, you can use that little box in the</p> <p>3 left-hand corner to type a 45 or you can just</p> <p>4 scroll down. And we're looking for the paragraphs</p> <p>5 numbered 214 and 215. So, let me know when you get</p> <p>6 there, please.</p> <p>7 A. Oh, I found them.</p> <p>8 Q. Paragraph 214 says that you object</p> <p>9 generally to IU's mandate. Is that correct?</p> <p>10 A. Yes.</p> <p>11 Q. And that you object to taking the</p> <p>12 vaccine "given the known and unknown risks</p> <p>13 associated with it and the extremely minimal risk</p> <p>14 of COVID to her age group."</p> <p>15 Do you see that?</p> <p>16 A. Yes, I do.</p> <p>17 Q. So, let's start at the beginning. You</p> <p>18 object generally to the mandate. Does that mean</p> <p>19 the requirement that you be vaccinated?</p> <p>20 A. Yes.</p> <p>21 Q. Have you sought an exemption from that</p> <p>22 requirement?</p> <p>23 A. No.</p> <p>24 Q. In this -- why not?</p>	<p style="text-align: right;">Page 16</p> <p>1 A. I don't -- I don't think I should have</p> <p>2 to do an exemption and still have to wear a face</p> <p>3 mask and do COVID testing.</p> <p>4 Q. Okay. Let's talk about that a little</p> <p>5 bit. What's your understanding of the effect of an</p> <p>6 exemption?</p> <p>7 A. My understanding is it would exempt me</p> <p>8 from having to do the COVID vaccine, but I would</p> <p>9 still have to test twice a week and wear a face</p> <p>10 mask. Is that correct?</p> <p>11 Q. I can't testify, but I'm interested in</p> <p>12 your understanding. So, I'm thankful for that</p> <p>13 answer, Natalie. I just wanted to, you know -- I'm</p> <p>14 just here to get what your understanding is.</p> <p>15 So, the exemption would give you an</p> <p>16 exemption from taking the actual vaccine but not</p> <p>17 from masking and testing. Is that your</p> <p>18 understanding?</p> <p>19 A. Yes.</p> <p>20 Q. So, you don't think you should have to</p> <p>21 do an exemption. Do you believe that you qualify</p> <p>22 for any type of exemption?</p> <p>23 A. No.</p> <p>24 Q. What is the reason that you do not</p>

<p style="text-align: right;">Page 17</p> <p>1 intend to get vaccinated?</p> <p>2 A. Because of the risks and I think it</p> <p>3 would cause me to be more unhealthy than how</p> <p>4 healthy I am right now.</p> <p>5 Q. Okay. Let's talk about that.</p> <p>6 What are the risks that you're</p> <p>7 referencing associated with the vaccine?</p> <p>8 A. I know that there's healthy people my</p> <p>9 age that are like in the hospital or dying because</p> <p>10 of the vaccine.</p> <p>11 Q. How do you know that?</p> <p>12 A. Through research I've been doing.</p> <p>13 Q. Do you know any of those people</p> <p>14 personally?</p> <p>15 A. No.</p> <p>16 Q. What kind of research have you been</p> <p>17 doing?</p> <p>18 A. Just researching what's been happening</p> <p>19 to people my age when they get the vaccine.</p> <p>20 Q. And what -- are you doing that at a</p> <p>21 library or how are you doing that research?</p> <p>22 A. Online.</p> <p>23 Q. Do you have any particular sources that</p> <p>24 you use for that research?</p>	<p style="text-align: right;">Page 18</p> <p>1 A. No, not with me.</p> <p>2 Q. Well, just in general. I just want you</p> <p>3 to tell me about the sources that you're</p> <p>4 referencing where you've seen this information</p> <p>5 about healthy people being injured by the vaccine.</p> <p>6 A. One that I saw recently on Facebook, a</p> <p>7 mother posted about how her son died. This</p> <p>8 happened a couple weeks ago. Her son died. I</p> <p>9 believe he was 14 years old. He got the vaccine</p> <p>10 and a few days later he died in the hospital. He</p> <p>11 was a very healthy kid.</p> <p>12 Q. Was that like a news article or a post</p> <p>13 by that woman?</p> <p>14 A. It was a post by the woman, but it was</p> <p>15 also on the news I believe.</p> <p>16 Q. Was that locally here in Indiana?</p> <p>17 A. I don't know.</p> <p>18 Q. Okay. So, that -- you have seen that</p> <p>19 article. What other research have you done into</p> <p>20 the risks of the COVID vaccine?</p> <p>21 A. I don't know off the top of my head.</p> <p>22 Q. Have you done more research than reading</p> <p>23 that one article on Facebook?</p> <p>24 A. Yes.</p>
<p style="text-align: right;">Page 19</p> <p>1 Q. Can you give me any sense of how much</p> <p>2 other research that you've done?</p> <p>3 A. I've seen data, like public records from</p> <p>4 hospitals. A lot of deaths for people between the</p> <p>5 ages of like late teens and early 20s were caused</p> <p>6 by the different types of vaccines.</p> <p>7 Q. Okay. Where did you get those public</p> <p>8 records?</p> <p>9 A. Me and my mom were looking at them</p> <p>10 online.</p> <p>11 Q. Was that on social media or some other</p> <p>12 source?</p> <p>13 A. It wasn't social media. It was records</p> <p>14 from a hospital.</p> <p>15 Q. How did you find those online?</p> <p>16 A. I don't remember.</p> <p>17 Q. Have you and your mom or you</p> <p>18 independently read any of the CDC guidelines about</p> <p>19 safety of the vaccine for people your age?</p> <p>20 A. Yes.</p> <p>21 Q. And do you know what they say?</p> <p>22 A. Yes. On their website it seems like</p> <p>23 they're supporting all age groups to get the</p> <p>24 vaccine.</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. The public records that you said that</p> <p>2 you saw, the hospital public records, what gives</p> <p>3 you confidence that those records are authentic</p> <p>4 records or real documents?</p> <p>5 A. I -- can you rephrase that question?</p> <p>6 Q. I'm trying to understand -- yes, sure.</p> <p>7 I want to understand what you were</p> <p>8 looking at and how you know that it was a public</p> <p>9 record from a hospital.</p> <p>10 A. I would have to go back and show you.</p> <p>11 Q. Was it on the hospital's website, for</p> <p>12 example?</p> <p>13 A. I -- I think so.</p> <p>14 Q. Do you remember what hospital it was?</p> <p>15 A. No.</p> <p>16 Q. Was it local here in Indiana?</p> <p>17 A. I'm not sure.</p> <p>18 Q. Okay. Are there any other reasons that</p> <p>19 you haven't already told me that you believe that</p> <p>20 you are at risk from getting the COVID vaccine?</p> <p>21 A. I -- I believe I'm very healthy and</p> <p>22 since there is very minimal risk of anything</p> <p>23 happening to me if I got COVID, I'd -- I think</p> <p>24 there is more risk if I got the vaccine.</p>

<p style="text-align: right;">Page 21</p> <p>1 Q. So, when you compare the risk of getting</p> <p>2 the vaccine and the risk of getting COVID, what's</p> <p>3 your belief about which one is more dangerous?</p> <p>4 A. The vaccine is more dangerous.</p> <p>5 Q. What's the basis of that belief?</p> <p>6 A. It's -- it's an experimental vaccine.</p> <p>7 Q. Okay. Tell me about that. What does</p> <p>8 that mean?</p> <p>9 A. There's no long-term known risks for it.</p> <p>10 Q. Are the -- are the long-term risks of</p> <p>11 COVID known?</p> <p>12 A. I don't know.</p> <p>13 Q. Has any medical professional ever told</p> <p>14 you that the vaccine will put your health at risk?</p> <p>15 A. Not specifically to me.</p> <p>16 Q. Yes. That's what I'm asking about. You</p> <p>17 consulting with a medical professional and that</p> <p>18 medical professional saying specifically, "You,</p> <p>19 Natalie, are going to be at risk if you take the</p> <p>20 vaccine."</p> <p>21 A. No.</p> <p>22 Q. Has that happened?</p> <p>23 A. No.</p> <p>24 Q. Are you aware of -- in your research,</p>	<p style="text-align: right;">Page 22</p> <p>1 did you become aware of people in your age group</p> <p>2 that contracted COVID?</p> <p>3 A. Can you rephrase your question?</p> <p>4 Q. Sure. Are you aware of whether anybody</p> <p>5 in your age group has contracted COVID ever?</p> <p>6 A. Yes.</p> <p>7 Q. Are you aware of whether any of those</p> <p>8 people have been hospitalized?</p> <p>9 A. No one that I know who has had COVID has</p> <p>10 been hospitalized.</p> <p>11 Q. How many people do you know that have</p> <p>12 had COVID?</p> <p>13 A. I can't give you an exact number.</p> <p>14 Q. Would you say it's in the single digits</p> <p>15 or like dozens? We'll just pick a couple of</p> <p>16 benchmarks.</p> <p>17 A. Probably in the single digits.</p> <p>18 Q. Okay. So, no one that you know has been</p> <p>19 hospitalized. Have you read any data about in</p> <p>20 Indiana or nationally the rate at which people in</p> <p>21 your age group are hospitalized if they contract</p> <p>22 COVID?</p> <p>23 A. No.</p> <p>24 Q. That was not part of your research?</p>
<p style="text-align: right;">Page 23</p> <p>1 A. My research was on the COVID vaccine.</p> <p>2 Q. Okay. So, you haven't done any research</p> <p>3 on the risks of COVID itself?</p> <p>4 A. I have -- I mean, I have read things</p> <p>5 about the risks of COVID.</p> <p>6 Q. And what do those things say?</p> <p>7 A. From -- from what I've seen, there is</p> <p>8 more risk depending on like your age. I know</p> <p>9 people in my age group are very low risk.</p> <p>10 Q. Very low risk for what? For getting</p> <p>11 COVID in the first place, for being hospitalized,</p> <p>12 for dying? Any of those?</p> <p>13 A. Hospitalized, dying.</p> <p>14 Q. Are you aware that people in your age</p> <p>15 group have been hospitalized due to contracting</p> <p>16 COVID?</p> <p>17 A. Yes. No one that I know personally has</p> <p>18 been hospitalized due to COVID.</p> <p>19 Q. But you're aware that people in your age</p> <p>20 group have been hospitalized, correct?</p> <p>21 A. Yes.</p> <p>22 Q. Are you also aware that people in your</p> <p>23 age group have died from COVID?</p> <p>24 A. Yes.</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. Have you told me everything that you</p> <p>2 know about the basis of your understanding that</p> <p>3 receiving the vaccine is more dangerous to you than</p> <p>4 contracting COVID?</p> <p>5 A. Yes.</p> <p>6 Q. Have you personally ever had COVID?</p> <p>7 A. No.</p> <p>8 Q. Anyone in your household?</p> <p>9 A. No.</p> <p>10 Q. Have you ever been tested for COVID?</p> <p>11 A. Yes.</p> <p>12 Q. How many times?</p> <p>13 A. I was tested once a week for the entire</p> <p>14 time I lived at IU Bloomington.</p> <p>15 Q. So, is that from, if we were going to</p> <p>16 guesstimate, mid-August to sometime in November --</p> <p>17 A. Yes.</p> <p>18 Q. -- of 2020?</p> <p>19 A. Yes.</p> <p>20 Q. And how was that test performed?</p> <p>21 A. It was a spit test.</p> <p>22 Q. And how did that -- like how did you do</p> <p>23 that? How did that work? I've never had one of</p> <p>24 those.</p>

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1 A. They give you a tiny bottle, and you
2 have to spit until it gets to the line and you --
3 you untwist this blue liquid. You pour it in. You
4 shake it up. And then you just give it to the
5 people doing the testing.
6 Q. Is that something that you went to a
7 particular physical location to do or would you do
8 that in your dorm room or somewhere else?
9 A. I had to go to a physical location.
10 Q. And you did that once a week during that
11 period. Have you had any other COVID tests?
12 A. Yes.
13 Q. Tell me about those.
14 A. Before I went to IU my freshman year,
15 before I went to IU Bloomington, I think I had to
16 get tested twice before I was allowed to move in.
17 Q. So, is that sometime in July or
18 August of 2020?
19 A. Yes.
20 Q. Were those tests that were done at
21 Bloomington or somewhere else?
22 A. They weren't at Bloomington. I had to
23 get a COVID test from somewhere to go to
24 Bloomington.

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1 A. No.
2 Q. Okay.
3 A. We -- it was -- the testing was in the
4 warehouse. I would just walk to the other side of
5 the warehouse to get a COVID test.
6 Q. So, kind of for something to do during
7 the day?
8 A. Yes.
9 Q. What was your job at Amazon?
10 A. I processed returns.
11 Q. And were you allowed to just go, walk
12 over in the warehouse and get a test as often as
13 you wanted?
14 A. No. Once a day someone would come
15 around and ask who wanted to get a COVID test. So,
16 I --
17 Q. Did you have -- go ahead.
18 A. A few times I volunteered.
19 Q. Did you have to have a reason to get a
20 test?
21 A. No.
22 Q. So, how many times -- how long did you
23 work there?
24 A. About two months.

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1 Q. And what type of test did you get for
2 that?
3 A. The nose swab.
4 Q. And you did that twice you said?
5 A. Yes.
6 Q. Any other COVID tests that you've ever
7 had?
8 A. Yes.
9 Q. Okay. Tell me about that.
10 A. I worked at Amazon for two months. I
11 started at the end of January of 2021, and I think
12 I -- I only got tested a few times there.
13 Q. Was that a test that you had to have as
14 a condition of working there?
15 A. No.
16 Q. Okay. Tell me why you got tested a few
17 times while you worked at Amazon.
18 A. If I'm being honest, I didn't enjoy
19 working at Amazon. So, it was something I could do
20 to have a little break while I was at work.
21 Q. Okay. I want to make sure I understand.
22 So, was this like if you needed to get a
23 COVID test, you could have time off from work for
24 that?

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1 Q. And during that time how many -- how
2 many COVID tests did you volunteer for?
3 A. I would say three or four.
4 Q. Were any of those tests positive?
5 A. No.
6 Q. What type of tests were those?
7 A. It was a nose swab.
8 Q. Would you get the results back right
9 away that day or how did you get the results from
10 those?
11 A. Two days later they would e-mail you the
12 results.
13 Q. How much time did you get kind of as a
14 break from the warehouse while you were having
15 those tests?
16 A. It depends how many people were in line
17 for testing. Probably around 20 minutes.
18 Q. Did you tend to volunteer when the line
19 was longer?
20 A. I -- I couldn't see how long the line
21 was. The testing site was on the other side of the
22 building.
23 Q. Okay. Any other COVID test that you've
24 had that we have not talked about?

<p style="text-align: right;">Page 29</p> <p>1 A. No.</p> <p>2 Q. And I may have already asked you this</p> <p>3 and I may not, Natalie. I'm not remembering.</p> <p>4 Have you ever had COVID?</p> <p>5 A. No.</p> <p>6 Q. Or COVID symptoms?</p> <p>7 A. No.</p> <p>8 Q. Never were sick and thought you might</p> <p>9 have COVID?</p> <p>10 A. No.</p> <p>11 Q. Okay. If we look at your Complaint,</p> <p>12 back at the document, in paragraph 216 it talks</p> <p>13 about your objection to the extra requirements of</p> <p>14 masks and testing and that you object to the "extra</p> <p>15 requirements given their unreasonableness and the</p> <p>16 extremely minimal risk of COVID to those in her age</p> <p>17 group."</p> <p>18 Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. We talked about your masking at</p> <p>21 Marshalls this summer. Can you tell me about other</p> <p>22 times that you have worn a mask for COVID purposes</p> <p>23 since March of 2020?</p> <p>24 A. I only wear a face mask when I'm</p>	<p style="text-align: right;">Page 30</p> <p>1 working. I don't wear a face mask anywhere else.</p> <p>2 Q. Okay. Did you have to wear a face mask</p> <p>3 when you were working at Amazon?</p> <p>4 A. Yes.</p> <p>5 Q. What about back, you know, March, April,</p> <p>6 May of 2020 when the pandemic was first starting</p> <p>7 and there were mask mandates in place for the --</p> <p>8 you know, kind of statewide. Did you ever wear a</p> <p>9 mask during that time period?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. Tell me about that experience.</p> <p>12 A. In 2020, so March of 2020?</p> <p>13 Q. Yes.</p> <p>14 A. In March of 2020, I remember my</p> <p>15 birthday -- my birthday is on March 15. So, I</p> <p>16 remember on my birthday we were -- we were not</p> <p>17 required to wear masks yet.</p> <p>18 So, probably in late March when</p> <p>19 everything closed down. I don't think I went</p> <p>20 anywhere. I remember I stayed at home for a very</p> <p>21 long time because my job also closed down.</p> <p>22 Q. Were you working at Marshalls at that</p> <p>23 time?</p> <p>24 A. Yes.</p>
<p style="text-align: right;">Page 31</p> <p>1 Q. Did you ever go to a store where you had</p> <p>2 to wear a mask?</p> <p>3 A. Not for at least a month after -- after</p> <p>4 everything closed down. I didn't go to a store for</p> <p>5 a long time.</p> <p>6 Q. Any time in 2020 did you wear a mask in</p> <p>7 a store?</p> <p>8 A. Yes.</p> <p>9 Q. In 2021 have you worn a mask in a store</p> <p>10 other than when you were at work?</p> <p>11 A. Yes.</p> <p>12 Q. Can you give me some examples?</p> <p>13 A. In -- in early 2021, so the first few</p> <p>14 months of this year, when masks were still</p> <p>15 required, I wore a mask.</p> <p>16 Q. Did you always wear a mask any time --</p> <p>17 have you always worn a mask any time that a mask</p> <p>18 has been required since the pandemic began?</p> <p>19 A. Yes.</p> <p>20 Q. And when you were at IU last year in</p> <p>21 August to November of 2020, were you required to</p> <p>22 wear a mask then?</p> <p>23 A. Yes.</p> <p>24 Q. Was that at all times?</p>	<p style="text-align: right;">Page 32</p> <p>1 A. Not while I was in my dorm room or when</p> <p>2 I was outside.</p> <p>3 Q. But otherwise at all times?</p> <p>4 A. Yes.</p> <p>5 Q. Right now today I think you told me</p> <p>6 you're only wearing masks while you're working at</p> <p>7 Marshalls, is that right?</p> <p>8 A. Yes.</p> <p>9 Q. And that's 40 hours a week?</p> <p>10 A. Yes.</p> <p>11 Q. Is it your -- did you consider leaving</p> <p>12 school last year because you had to wear a mask?</p> <p>13 A. I -- I left because I was in a very bad</p> <p>14 head space there.</p> <p>15 Q. Was that related to masking or COVID</p> <p>16 testing?</p> <p>17 A. Yes. Those were a couple of the</p> <p>18 reasons.</p> <p>19 Q. Can you tell me more about that?</p> <p>20 A. One, there was one moment where it kind</p> <p>21 of pushed me over the edge. I was -- I went in the</p> <p>22 hallway of my dorm to use the restroom, and I -- I</p> <p>23 didn't have my mask all the way up on the way to</p> <p>24 the restroom. It was just down the hallway. And I</p>

<p style="text-align: right;">Page 33</p> <p>1 was stopped by an RA and he -- he was asking for</p> <p>2 all of my information to write me up because my</p> <p>3 mask wasn't all the way up.</p> <p>4 Q. Did you have any other incidents like</p> <p>5 that from August to November when you were at</p> <p>6 Bloomington last year?</p> <p>7 A. Yes.</p> <p>8 Q. Tell me about that.</p> <p>9 A. The same RA stopped me and my friends</p> <p>10 because my friend also -- well, this was a</p> <p>11 different moment. My friend didn't have her mask</p> <p>12 on all the way. I think it was like right below</p> <p>13 her nose. And he wanted all of our user names, our</p> <p>14 dorm number, everything. I thought it was insane.</p> <p>15 I couldn't live there anymore.</p> <p>16 Q. Have you considered quitting your job at</p> <p>17 Marshalls because of the mask requirement?</p> <p>18 A. No.</p> <p>19 Q. Are you -- when I read paragraph 216, I</p> <p>20 see that you object to masking and testing because</p> <p>21 they're unreasonable and because of the views that</p> <p>22 I think we talked about that your age group is not</p> <p>23 at particular risk for COVID in your opinion.</p> <p>24 Is that a fair reading of paragraph 216?</p>	<p style="text-align: right;">Page 34</p> <p>1 A. Yes.</p> <p>2 Q. Is there any harm that you will</p> <p>3 experience if you wear a mask on campus at IUPUI</p> <p>4 this fall?</p> <p>5 A. I do think that I could be segregated</p> <p>6 from the people who were vaccinated.</p> <p>7 Q. What do you mean by "segregated"?</p> <p>8 A. I think I would be treated differently</p> <p>9 because I have a mask on and because I would have</p> <p>10 to be tested twice a week.</p> <p>11 Q. Treated differently by whom?</p> <p>12 A. By IU students and IU staff.</p> <p>13 Q. And what's the basis for this prediction</p> <p>14 that you could be segregated or treated</p> <p>15 differently?</p> <p>16 A. I did hear about a hotline that IU has</p> <p>17 to tell on people if they are -- like if they are</p> <p>18 not following mandates. I don't have a source from</p> <p>19 that.</p> <p>20 Q. Where did you hear about that?</p> <p>21 A. On a Zoom call.</p> <p>22 Q. Was that on a Zoom call related to this</p> <p>23 lawsuit or something else?</p> <p>24 A. Related to this lawsuit.</p>
<p style="text-align: right;">Page 35</p> <p>1 Q. Did you hear about it from another</p> <p>2 Plaintiff?</p> <p>3 A. Yes.</p> <p>4 Q. Did you know about that hotline before</p> <p>5 the lawsuit was filed?</p> <p>6 A. No.</p> <p>7 Q. Do you know what that -- do you know any</p> <p>8 other details about that hotline, what it's for or</p> <p>9 who is supposed to use it or anything?</p> <p>10 A. No.</p> <p>11 Q. Do you have any experience with it at</p> <p>12 all?</p> <p>13 A. No. I had never heard of the hotline</p> <p>14 before that.</p> <p>15 Q. So, what does the existence of a hotline</p> <p>16 have to do with your belief that you could be</p> <p>17 segregated or treated differently?</p> <p>18 A. I think it's like a way to tell on</p> <p>19 people if you -- if you don't like that they're</p> <p>20 not -- like they're not wearing a mask or if you</p> <p>21 find out they're not vaccinated. I'm pretty sure</p> <p>22 that's what it's for.</p> <p>23 Q. So, is your concern with IU's efforts to</p> <p>24 enforce its policies? Do you believe it should not</p>	<p style="text-align: right;">Page 36</p> <p>1 be able to enforce its policies?</p> <p>2 A. Can you rephrase that question?</p> <p>3 Q. Sure. You mentioned the existence of</p> <p>4 this hotline, and I'm trying to figure out how it</p> <p>5 is that you would be harmed by the existence of</p> <p>6 this hotline, if it exists.</p> <p>7 A. I think if -- if someone called and said</p> <p>8 like "Natalie is not wearing a mask" or something</p> <p>9 like that, I think that I could be like targeted by</p> <p>10 IU.</p> <p>11 Q. Is it your understanding that if you are</p> <p>12 not vaccinated in the fall that you will need to</p> <p>13 wear a mask at IU?</p> <p>14 A. Yes.</p> <p>15 Q. Is it your intention that you're not</p> <p>16 going to follow that requirement?</p> <p>17 A. I'm -- can you rephrase that question?</p> <p>18 Q. If you are not vaccinated and you go to</p> <p>19 campus in the fall semester, are you going to wear</p> <p>20 a mask as required by IU's policies?</p> <p>21 A. No.</p> <p>22 Q. So, it's your intention to violate IU's</p> <p>23 policies?</p> <p>24 A. No.</p>

<p style="text-align: right;">Page 37</p> <p>1 Q. Can you explain your answer?</p> <p>2 A. I'm trying to not -- I don't want to get</p> <p>3 vaccinated to go to college, and I also don't want</p> <p>4 to wear -- be required to wear a mask to go to</p> <p>5 college; and that is why I am a part of this</p> <p>6 lawsuit.</p> <p>7 Q. Okay. Do you understand that IU's</p> <p>8 policy for unvaccinated students this fall is that</p> <p>9 you will have to wear a mask on campus?</p> <p>10 A. Yes. But what I don't understand is why</p> <p>11 I would have to wear a mask if people who are</p> <p>12 vaccinated are protected.</p> <p>13 Q. Is it your intention that you will or</p> <p>14 will not wear a mask on campus this fall?</p> <p>15 A. I will not be wearing a mask.</p> <p>16 Q. So, is that why you are concerned about</p> <p>17 the existence of the hotline, because you intend to</p> <p>18 violate IU's policies?</p> <p>19 A. No.</p> <p>20 Q. Okay. I'm just trying to make sure I</p> <p>21 understand your testimony.</p> <p>22 You've told me there is this hotline</p> <p>23 that causes some concern to you. You've told me</p> <p>24 that you don't intend to wear a mask on campus this</p>	<p style="text-align: right;">Page 38</p> <p>1 fall even though you're unvaccinated.</p> <p>2 Is there any connection between those</p> <p>3 two things in your mind or no?</p> <p>4 A. I brought up the hotline because I heard</p> <p>5 it was like a way to tell on people if -- if there</p> <p>6 is any concerns with -- related to COVID.</p> <p>7 Q. But what would someone have a concern</p> <p>8 about with respect to you on campus this fall?</p> <p>9 A. I don't know. I'm not -- I don't know</p> <p>10 everything about the hotline.</p> <p>11 Q. With respect to -- have you told me all</p> <p>12 of the harm that you could experience by wearing a</p> <p>13 mask this fall, understanding that you don't have</p> <p>14 any intention to do that?</p> <p>15 A. Yes.</p> <p>16 Q. Do you understand that if you're not</p> <p>17 vaccinated this fall, you will need to undergo</p> <p>18 surveillance testing for COVID-19?</p> <p>19 A. Yes.</p> <p>20 Q. What is the harm that you will</p> <p>21 experience from undergoing surveillance testing?</p> <p>22 A. I don't -- I don't believe I should have</p> <p>23 to get COVID testing twice a week.</p> <p>24 Q. I understand that. But if you do have</p>
<p style="text-align: right;">Page 39</p> <p>1 to get it, what's the harm that you'll experience?</p> <p>2 A. I think if -- if I did test positively</p> <p>3 for COVID, the harm I could experience is not being</p> <p>4 able to go to my classes.</p> <p>5 Q. So, do I understand you correctly that</p> <p>6 you don't want to be tested for COVID because you</p> <p>7 don't want to find out whether you have COVID?</p> <p>8 A. No.</p> <p>9 Q. Okay. What is the harm to you by being</p> <p>10 tested for COVID?</p> <p>11 A. It could take time away from when I</p> <p>12 could be studying or working.</p> <p>13 Q. When you did the testing last fall, was</p> <p>14 that a time-consuming process?</p> <p>15 A. Yes.</p> <p>16 Q. Tell me about that.</p> <p>17 A. There would be -- well, I would have to</p> <p>18 walk from my dorm to the stadium to get tested,</p> <p>19 which took about 20 minutes to get there, 20</p> <p>20 minutes back. I didn't have a car. And there were</p> <p>21 some days when it was extremely hot outside.</p> <p>22 It took a decent amount of time away</p> <p>23 from my day. I would have to wait in line to get</p> <p>24 tested. And I could have been studying or I would</p>	<p style="text-align: right;">Page 40</p> <p>1 have to hurry in order to get back to my dorm to do</p> <p>2 a Zoom.</p> <p>3 Q. Could you have taken a bus last year?</p> <p>4 A. I could have. The bus schedule is very</p> <p>5 complicated.</p> <p>6 Q. Do you know anything about the plans for</p> <p>7 how testing will occur this fall on the</p> <p>8 Indianapolis campus since you'll be in a different</p> <p>9 setting this fall?</p> <p>10 A. No.</p> <p>11 Q. You won't be living on campus, right, so</p> <p>12 you won't have to walk from your dorm to anywhere,</p> <p>13 correct?</p> <p>14 A. Yes.</p> <p>15 Q. And you don't have any information about</p> <p>16 how long that testing process will take, correct?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. I think what you told me about</p> <p>19 testing is that you don't believe that you should</p> <p>20 have to be tested?</p> <p>21 A. Yes.</p> <p>22 Q. Anything else that I should know about</p> <p>23 the harm that you will experience if you're tested</p> <p>24 on campus this fall?</p>

<p style="text-align: right;">Page 41</p> <p>1 A. I believe that if I got tested for 2 COVID, then the people who are vaccinated should 3 also be tested for COVID because from my 4 understanding they can still get COVID even with 5 the vaccine. 6 Q. Are you familiar with IU's testing 7 policies for vaccinated individuals? 8 A. Yes. They -- they don't need to get 9 tested. 10 Q. Ever? 11 A. I don't know. 12 Q. Okay. So, is your concern about you 13 having to get tested or is your concern about other 14 people not having to get tested? 15 A. Both. 16 Q. And what's your concern about other 17 people not being tested? How does it harm you for 18 vaccinated people not to be tested at the same 19 frequency? 20 A. I think it's unfair. 21 Q. What are your plans for -- for this fall 22 if you -- if the injunction is not granted. 23 A. So, if -- if the injunction is not 24 granted, what do you mean by that?</p>	<p style="text-align: right;">Page 42</p> <p>1 Q. Are you going to go -- are you going to 2 go to IUPUI to class on campus starting in August? 3 A. I'm sorry. Can you rephrase the 4 question? 5 Q. Yeah, sure. So, the Court is going to 6 decide whether or not these policies can stay in 7 effect for the fall semester. Is that your 8 understanding? 9 A. Yes. 10 Q. If the Court decides that the policies 11 will stay in effect for the fall semester, do you 12 still intend to attend on-campus classes in 13 Indianapolis? 14 A. No. 15 Q. Is it your intention to withdraw from 16 IU? 17 A. If the policies remain the same, then I 18 will not be going to IU. 19 Q. What will you do instead? 20 A. I will continue working full time and 21 possibly find a different college to attend. 22 Q. Do you get any other vaccines ever, 23 Natalie? Have you ever had another vaccine? 24 A. I got the meningitis vaccine I believe</p>
<p style="text-align: right;">Page 43</p> <p>1 before I started my freshman year of college. 2 Q. Are you aware of whether you've had any 3 other vaccines? 4 A. I don't remember. 5 Q. When you were -- did you go to public 6 school when you were a kid? 7 A. Yes. 8 Q. Do you know if you had to be vaccinated 9 to do that? 10 A. I don't remember. Do you mean high 11 school or elementary school? 12 Q. Ever. Ever got vaccination shots? 13 A. I don't remember. 14 Q. Have you ever gotten a flu shot? 15 A. I think the last time I got a flu shot I 16 was very young. 17 Q. I think you said to me earlier that 18 people who are vaccinated are protected from COVID. 19 Can you tell me more about what you meant by that? 20 A. I think that people think it's 21 protecting them from COVID. I don't think it's 22 protecting them from COVID. 23 Q. You don't believe that the COVID 24 vaccines protect people from COVID?</p>	<p style="text-align: right;">Page 44</p> <p>1 A. I am not sure. I am not a doctor. 2 Q. Okay. I just want to make sure I 3 understand your answer. I think you just told me 4 you don't think that they protect people from 5 COVID. Is your answer that you don't know whether 6 they do or you think they do not? 7 A. I don't know if they do. I know that 8 they can still get COVID if they have the vaccine. 9 Q. Okay. Do you understand that there 10 could be individuals who attend IUPUI that would 11 like to get vaccinated but cannot get vaccinated 12 for medical reasons? 13 A. I don't know. 14 Q. Is it your understanding that your 15 wearing a mask provides benefits to other people? 16 A. Can you rephrase the question, please? 17 Q. If you had COVID, Natalie, and you 18 didn't know it and you were wearing a mask, does 19 that protect other people from contracting COVID 20 from you? 21 A. Not really. 22 Q. Why not? 23 A. I've seen articles that say that masks 24 don't work for the spread of COVID.</p>

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1 Q. Tell me about those articles.
2 A. I'm pretty sure they say that just the
3 basic face masks, you can still blow air through
4 them. You can still blow your germs through the
5 face mask. You can still spread germs while
6 wearing a face mask.
7 Q. Do you have any other -- did you do any
8 other research or is there any other kind of
9 scientific basis for that understanding?
10 A. I haven't read about face masks for a
11 while.
12 Q. Just give me one second, Natalie.
13 Other than the hotline that you
14 identified, is there any other basis or evidence
15 you have for your concern that you might be
16 segregated, I think you said, at IUPUI?
17 A. I think that if someone saw me wearing a
18 face mask they would know that I did not get the
19 vaccine. I would be treated differently most
20 likely.
21 Q. Why would someone treat you differently?
22 A. I think if there was someone who's
23 really pushing for the vaccine and they know that I
24 did not get it, they might not treat me fairly.

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1 Q. When's the last time you were there?
2 A. Last year, maybe two years ago.
3 Q. Will you have class every day in the
4 fall?
5 A. I don't know. I would have to look at
6 my schedule.
7 Q. Are all --
8 A. I can't remember.
9 Q. Okay. Sorry. Do you remember if all
10 the classes that you're enrolled for are fully in
11 person?
12 A. I know four of them are in person. One
13 of them is hybrid.
14 Q. Does that mean part of it would be
15 online?
16 A. My adviser said it would be every other
17 week is in person.
18 Q. Have you started looking at other
19 colleges that you might go to if the injunction is
20 not granted?
21 A. Not yet.
22 MS. RICCHIUTO: I don't think I have any more
23 questions for you, Natalie.
24 Melena, do you have questions?

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1 Q. Do you understand that there are
2 circumstances under which vaccinated individuals
3 might choose to wear a mask at IUPUI?
4 A. Yes. So, they -- they have a choice to
5 wear a mask, but they don't have to.
6 Q. Right. But, so, if I encounter another
7 student, if I'm a student at IUPUI and I see
8 another student who has a mask on, I don't have any
9 way to know whether that person has been vaccinated
10 or not, do I?
11 A. No.
12 Q. Have you had experience in some other
13 context where you were treated unfairly or I think
14 you said segregated because you had a mask?
15 A. No.
16 Q. And you are willing to wear a mask for
17 your ongoing employment at Marshalls, but it sounds
18 like unwilling to wear a mask to attend IUPUI. Is
19 that accurate?
20 A. Yes. Marshalls is changing that rule
21 very soon.
22 Q. Have you been to the IUPUI campus
23 recently for any reason?
24 A. No.

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1 MS. SIEBERT: I do, but I'd like to, if we
2 could, go off the record and take like a
3 five-minute bathroom break, I would appreciate
4 that.
5 MS. RICCHIUTO: That would be fine.
6 MS. SIEBERT: Is that okay with everyone?
7 MS. RICCHIUTO: Yes, it sure is. Thank you.
8 (WHEREUPON, a recess was had
9 from 12:04 to 12:07 p.m.)
10 EXAMINATION
11 BY MS. SIEBERT:
12 Q. Natalie, I just wanted to -- thanks for
13 your time today. I just wanted to do a couple of
14 follow-up questions, make sure that we're all on
15 the same page about some things that you and Anne
16 spoke about. Is that okay with you?
17 A. Yes.
18 Q. Okay. Great. All right.
19 So, first, I want to -- you had
20 testified that you have no intention of
21 receiving -- taking the vaccine, COVID vaccine,
22 correct?
23 A. Yes.
24 Q. Okay. And I believe you also testified

<p style="text-align: right;">Page 49</p> <p>1 that you don't qualify for an exemption from the</p> <p>2 vaccine?</p> <p>3 A. Yes.</p> <p>4 Q. What's your understanding of what</p> <p>5 qualifies someone for an exemption at IU from the</p> <p>6 Vaccine Mandate?</p> <p>7 A. My understanding is it's a religious or</p> <p>8 medical exemption.</p> <p>9 Q. Okay. And, so, you don't think you</p> <p>10 honestly qualify for either of those exemptions?</p> <p>11 A. Yes. I don't think I qualify for them.</p> <p>12 Q. Okay. And, so, is it your</p> <p>13 understanding, then, if you don't qualify for the</p> <p>14 exemption, the mandate then mandates that you have</p> <p>15 to wear a mask and get tested and go through those</p> <p>16 extra requirements at IU?</p> <p>17 A. Yes.</p> <p>18 Q. I know you talked a little bit about</p> <p>19 your experience last fall when you were in</p> <p>20 Bloomington and just being in a bad head space I</p> <p>21 think is the quote that you used. I can certainly</p> <p>22 understand that. My daughter was a freshman last</p> <p>23 year, too, at college.</p> <p>24 Can you just tell me a little bit</p>	<p style="text-align: right;">Page 50</p> <p>1 about -- I know you described some experiences with</p> <p>2 your RA and some different specifics. But just in</p> <p>3 general how was your -- how was that experience at</p> <p>4 Bloomington? Just in general. How did it make you</p> <p>5 feel?</p> <p>6 A. It was very depressing in general. Not</p> <p>7 only for me, but also my roommate. We were going</p> <p>8 through a tough time. We were staying in our dorm</p> <p>9 for most of the day unless we left to get food from</p> <p>10 the food court. It was -- it felt like I was</p> <p>11 almost in prison.</p> <p>12 Q. Did that feel isolating to you?</p> <p>13 A. Yes. I wasn't able to make any friends</p> <p>14 there.</p> <p>15 Q. Is that how you envisioned your freshman</p> <p>16 year of college being?</p> <p>17 A. No. Not at all.</p> <p>18 Q. And, so, were all of those feelings part</p> <p>19 of what influenced your decision to come home then</p> <p>20 and take the rest of the semester? I think you</p> <p>21 testified that you came home in November, around</p> <p>22 November of last year?</p> <p>23 A. Yes.</p> <p>24 Q. And, so, you finished your first</p>
<p style="text-align: right;">Page 51</p> <p>1 semester at home and then you continued with your</p> <p>2 second semester at home?</p> <p>3 A. Yes.</p> <p>4 Q. And were all of those feelings that you</p> <p>5 experienced in your time at Bloomington part of the</p> <p>6 reason why you decided to come home and finish</p> <p>7 there?</p> <p>8 A. Yes.</p> <p>9 Q. Did you have other friends that may have</p> <p>10 gone to either IU or other colleges that made that</p> <p>11 similar type of decision after a time at college?</p> <p>12 A. Yes. My friend group I had, two of them</p> <p>13 went to other colleges. The other friend was my</p> <p>14 roommate. And we all ended up moving home.</p> <p>15 Q. Did they -- did you talk to your friends</p> <p>16 about their experiences, either at IU or other</p> <p>17 colleges?</p> <p>18 A. Yes.</p> <p>19 Q. Is it your understanding from all of</p> <p>20 those conversations that your friend group, a lot</p> <p>21 of them experienced the same type of feelings?</p> <p>22 A. Yes. We were all feeling the same way.</p> <p>23 MS. SIEBERT: Sorry, Natalie, just so the</p> <p>24 Court Reporter can get everything down.</p>	<p style="text-align: right;">Page 52</p> <p>1 Anne, I'm sorry. I thought you said</p> <p>2 something.</p> <p>3 MS. RICCHIUTO: Just objection; hearsay.</p> <p>4 MS. SIEBERT: Okay.</p> <p>5 BY MS. SIEBERT:</p> <p>6 Q. Natalie, you can go ahead and answer</p> <p>7 that. Could you repeat your answer. I'm sorry.</p> <p>8 "We were all."</p> <p>9 A. Yes, we were all feeling the same way.</p> <p>10 Q. Okay. A couple of specific things. I</p> <p>11 want to -- do you still have the Complaint up on</p> <p>12 the exhibit link?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Could you go to paragraph 215.</p> <p>15 A. Yes.</p> <p>16 Q. I know you testified previously about</p> <p>17 some of the risks that you felt were or thought</p> <p>18 were part of somebody your age taking the vaccine,</p> <p>19 but I just want to make sure that we are on the</p> <p>20 same page on something.</p> <p>21 The first part of paragraph 215 said</p> <p>22 that you have spent some "significant time</p> <p>23 researching the vaccine and does not feel safe when</p> <p>24 taking it when those in her age group are</p>

<p style="text-align: right;">Page 53</p> <p>1 developing heart problems as a result of the</p> <p>2 vaccine."</p> <p>3 I just want to clarify.</p> <p>4 Do you remember reading in research</p> <p>5 specifically about heart problems developing in</p> <p>6 people of your age that have taken the vaccine?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. I just don't recall speaking</p> <p>9 about the heart problems before, so I just wanted</p> <p>10 to make sure that that had in fact -- that you did</p> <p>11 have that.</p> <p>12 And do you remember doing that research</p> <p>13 and hearing about that before the Complaint was</p> <p>14 filed before you signed the verification form?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Thank you. I also want to</p> <p>17 clarify. Earlier when Anne was asking you if you</p> <p>18 intended to wear a mask on IUPUI's campus in the</p> <p>19 fall, I believe you testified that you did not</p> <p>20 intend to do so. Do you remember that?</p> <p>21 A. Yes.</p> <p>22 Q. And I certainly don't want to put words</p> <p>23 into your mouth. So, if this summary is not</p> <p>24 accurate, then please let me know. Okay.</p>	<p style="text-align: right;">Page 54</p> <p>1 My understanding about the whole scope</p> <p>2 of your testimony is that you didn't intend to wear</p> <p>3 a mask, but it's because you didn't intend to then</p> <p>4 attend IUPUI, so it's not -- is that accurate?</p> <p>5 A. Yes.</p> <p>6 Q. So, is it fair to say that your</p> <p>7 intention is not to violate the policy; your</p> <p>8 intention is to not have the policy apply to you</p> <p>9 because you won't be a student there anymore?</p> <p>10 MS. RICCHIUTO: Objection; leading.</p> <p>11 BY THE WITNESS:</p> <p>12 A. Yes.</p> <p>13 BY MS. SIEBERT:</p> <p>14 Q. Thank you. Go ahead, Natalie. I'm</p> <p>15 sorry.</p> <p>16 MS. SIEBERT: Corey, did you get that</p> <p>17 objection?</p> <p>18 (WHEREUPON, the record was read</p> <p>19 by the reporter as requested.)</p> <p>20 BY MS. SIEBERT:</p> <p>21 Q. Let me rephrase that, Natalie.</p> <p>22 What did you mean by that when you said</p> <p>23 you intended not to wear a mask in the fall?</p> <p>24 A. If the lawsuit goes through and the</p>
<p style="text-align: right;">Page 55</p> <p>1 policies are put on hold, then I will not be</p> <p>2 wearing a mask. If it does not go through, I won't</p> <p>3 be attending IU.</p> <p>4 Q. Okay. And by "going through," what do</p> <p>5 you mean? Do you mean if the policy is -- so, if</p> <p>6 the policy is still in place, what will your</p> <p>7 decision be?</p> <p>8 A. If the policy to wear -- to wear a mask</p> <p>9 if you are not vaccinated is still there, then I</p> <p>10 will not be attending IU.</p> <p>11 Q. Okay. Thanks for clarifying that. I</p> <p>12 appreciate that.</p> <p>13 You had talked about that one of the</p> <p>14 harms that you could see from having to wear a mask</p> <p>15 because you're not vaccinated is being treated</p> <p>16 differently by IU students and staff.</p> <p>17 Is that accurate?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. All right. And Anne had asked</p> <p>20 you some of the bases for your thoughts on that.</p> <p>21 Do you remember that?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. Given your experiences last year</p> <p>24 in Bloomington, do those experiences inform your</p>	<p style="text-align: right;">Page 56</p> <p>1 concern that you would be treated differently by</p> <p>2 wearing a mask this year?</p> <p>3 MS. RICCHIUTO: Objection; calls for</p> <p>4 speculation.</p> <p>5 BY MS. SIEBERT:</p> <p>6 Q. You can go ahead and answer, Natalie.</p> <p>7 A. Yes. I think it was pretty traumatizing</p> <p>8 with my experience in the fall last year, everyone</p> <p>9 being very adamant for the masks and everything.</p> <p>10 And I did follow the policies. And I didn't want</p> <p>11 to go there anymore, and that's why I moved home.</p> <p>12 Q. So, was it your experience last year</p> <p>13 when you were in Bloomington that other students at</p> <p>14 IU, as well as staff, professors and whatnot, were</p> <p>15 very stringent about the mask wearing policy?</p> <p>16 A. Yes.</p> <p>17 MS. RICCHIUTO: Object to form.</p> <p>18 BY MS. SIEBERT:</p> <p>19 Q. You had also testified earlier that you</p> <p>20 heard about a -- the hotline from another</p> <p>21 Plaintiff?</p> <p>22 A. Yes.</p> <p>23 Q. Is that correct? Okay.</p> <p>24 Can you tell me about the, very</p>

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1 generally, what the context of when you heard about
2 that hotline from another Plaintiff was? What
3 setting were you in? What was the context?
4 A. It was on a Zoom call. She did not tell
5 me specifically. She was putting it out there to
6 the group.
7 Q. What was the purpose of that Zoom call?
8 A. It was preparing for our depositions.
9 Q. So, you -- I want to clarify because I
10 believe you also testified earlier that you have
11 never spoken to another Plaintiff. Is that
12 correct?
13 A. Yes.
14 Q. Okay. Is there any clarification you'd
15 like to make to that statement?
16 A. Yes. On the Zoom call, I did not speak
17 to any of the Plaintiffs. I only spoke to my
18 attorney. The other Plaintiffs were also just
19 speaking to the attorney, and I've never met them
20 before.
21 Q. Okay. Thank you very much.
22 You also testified that -- and Anne
23 asked about that you understood that people who
24 were vaccinated may also still choose to wear a

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1 will be less people wearing masks on IU's campus
2 this year than last year?
3 A. Yes.
4 MS. RICCHIUTO: Objection; calls for
5 speculation.
6 BY MS. SIEBERT:
7 Q. Does that inform your opinion that it
8 will be easier for someone on IU's campus to assume
9 that the people wearing masks have not been
10 vaccinated?
11 A. Yes.
12 MS. RICCHIUTO: Objection; calls for
13 speculation, lacks foundation.
14 MS. SIEBERT: I'm sorry. I'm not -- I know
15 it's a very pregnant pause. I'm just thinking here
16 for a moment.
17 MS. RICCHIUTO: Take your time.
18 MS. SIEBERT: I think I'm done.
19 MS. RICCHIUTO: I just have a few follow-up
20 questions. Natalie, we probably should have told
21 you at the beginning there could be a little
22 back-and-forth at the end, but I will try to be
23 brief.
24

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1 mask on IU's campus this year. Do you remember
2 that?
3 A. Yes.
4 Q. Is that accurate, what I just said, what
5 your testimony was?
6 A. Yes.
7 Q. Okay. Do you think that mask wearing
8 will be as common and prevalent this year on IU's
9 campus as it was last year?
10 A. No.
11 MS. RICCHIUTO: Objection; calls for
12 speculation, lacks foundation.
13 BY MS. SIEBERT:
14 Q. Have you personally observed people who
15 have been vaccinated now that are not wearing
16 masks?
17 A. Yes.
18 Q. Have you personally observed that since
19 the vaccine has become more -- more and more people
20 have taken the vaccine, have you personally
21 observed that more and more people are not wearing
22 masks now?
23 A. Yes.
24 Q. Does that inform your opinion that there

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1 FURTHER EXAMINATION
2 BY MS. RICCHIUTO:
3 Q. When you were talking about the very
4 beginning of the pandemic, March, April of 2020,
5 and you said you did not go anywhere for a really
6 long time. You stayed home. You weren't going
7 out. Do you remember that?
8 A. Yes.
9 Q. How was your head space during that
10 time?
11 A. I was feeling very lonely.
12 Q. So, maybe similar to how you felt at IU
13 that you described to Melena?
14 A. Yes.
15 Q. So, those feelings of isolation and
16 having the year not go the way that you had
17 planned, those were feelings that you were having
18 before you got to campus, right?
19 A. Yes. I was still in my senior year of
20 high school. So, that was very upsetting for me.
21 Q. Yeah. That's really tough. That is a
22 really tough situation.
23 With respect to -- I'm going to try not
24 to jump all over, but I think I probably will. So,

<p style="text-align: right;">Page 61</p> <p>1 I will just apologize in advance.</p> <p>2 Melena pointed you back to the</p> <p>3 Complaint, paragraph 215, where you said you spent</p> <p>4 significant time researching. Can you give me an</p> <p>5 estimate of how much time you spent researching</p> <p>6 that's being referenced in that paragraph?</p> <p>7 A. Do you mean like how many minutes?</p> <p>8 Q. Sure.</p> <p>9 A. I think it's just been like over the</p> <p>10 course of the last couple months since a lot of</p> <p>11 people started getting the vaccines. That's when I</p> <p>12 just -- I was skeptical, and I was just looking to</p> <p>13 see what information was coming out.</p> <p>14 Q. Okay. So, do you have any idea of how</p> <p>15 much time you've spent researching?</p> <p>16 A. I don't know. Probably -- I don't know.</p> <p>17 Q. Is it a matter of minutes?</p> <p>18 A. No. It's definitely hours.</p> <p>19 Q. And were they hours over a period of</p> <p>20 time or sort of one big long research day?</p> <p>21 A. Over a period of time.</p> <p>22 Q. Do you agree with the characterization</p> <p>23 of the word "significant" in the Complaint to</p> <p>24 describe the amount of time?</p>	<p style="text-align: right;">Page 62</p> <p>1 A. Yes. I would say that it is</p> <p>2 significant.</p> <p>3 Q. The amount of time that you've spent</p> <p>4 researching?</p> <p>5 A. Yes.</p> <p>6 Q. When you were talking to Melena about</p> <p>7 your friends' experiences at other schools, did I</p> <p>8 understand you to say that other college freshmen</p> <p>9 at other campuses were undergoing similar</p> <p>10 restrictions to what you faced at IU this fall?</p> <p>11 A. Yes, and I think just for me and my</p> <p>12 friend group at the time, we were all struggling</p> <p>13 the same way. We all felt pretty lonely.</p> <p>14 Q. As a result of having to start freshman</p> <p>15 year during a pandemic and not --</p> <p>16 A. Yes.</p> <p>17 Q. -- be able to do all the normal</p> <p>18 activities and not be able to meet people like you</p> <p>19 had hoped. Is that right?</p> <p>20 A. Yes.</p> <p>21 Q. With respect to the heart problems that</p> <p>22 Melena asked you about that are referenced in</p> <p>23 paragraph 215, can you tell me more about the heart</p> <p>24 problems that you believe that people in your age</p>
<p style="text-align: right;">Page 63</p> <p>1 group are developing?</p> <p>2 A. Yes. I know that they're developing</p> <p>3 inflammation around their heart, which is causing</p> <p>4 hospitalizations and also deaths for people my age.</p> <p>5 And I remember reading that it is because of one of</p> <p>6 the spike proteins in the vaccine is causing the</p> <p>7 inflammation around the heart.</p> <p>8 Q. Where did you read that?</p> <p>9 A. I can't remember.</p> <p>10 Q. How long ago did you read that?</p> <p>11 A. I think a few weeks ago is when I first</p> <p>12 read it, and I've been seeing a lot of different</p> <p>13 things about the same heart problems ever since</p> <p>14 then.</p> <p>15 Q. So, you said you "know." I think that's</p> <p>16 the word you used. How do you know about these</p> <p>17 heart problems?</p> <p>18 A. Sorry. Give me a second. I'm thinking.</p> <p>19 Q. Sure.</p> <p>20 A. I guess I shouldn't have said I know</p> <p>21 because I am not -- I'm not a doctor. I have --</p> <p>22 I've seen from a lot of different sources that</p> <p>23 there is inflammation around the heart due to the</p> <p>24 proteins in the vaccine.</p>	<p style="text-align: right;">Page 64</p> <p>1 Q. Are those sources on the Internet or</p> <p>2 somewhere else?</p> <p>3 A. They're on the Internet. Also from</p> <p>4 doctors saying it on the Internet.</p> <p>5 Q. Like videos or articles? Who are the</p> <p>6 doctors?</p> <p>7 A. Articles.</p> <p>8 Q. Do you know the name of any of the</p> <p>9 doctors?</p> <p>10 A. I cannot remember the name of -- there</p> <p>11 is one doctor that's been very vocal about it and</p> <p>12 writing articles about it. I can't remember his</p> <p>13 name.</p> <p>14 Q. Have you talked to any doctor about your</p> <p>15 belief that the COVID vaccine causes heart</p> <p>16 problems?</p> <p>17 A. No.</p> <p>18 Q. Have you done any research into whether</p> <p>19 COVID itself causes heart problems in people your</p> <p>20 age?</p> <p>21 A. No.</p> <p>22 Q. Are you aware of research that concludes</p> <p>23 that it does?</p> <p>24 A. That COVID -- the COVID vaccine or</p>

<p style="text-align: right;">Page 65</p> <p>1 COVID?</p> <p>2 Q. COVID itself causes inflammation of the</p> <p>3 heart, for example, in people your age.</p> <p>4 A. No.</p> <p>5 Q. If that were true, would that concern</p> <p>6 you as a risk of COVID?</p> <p>7 A. Yes. If it were true, it would concern</p> <p>8 me.</p> <p>9 Q. That's not something you've ever heard</p> <p>10 before, though?</p> <p>11 A. I have -- no, not from my age group.</p> <p>12 Q. When you were testifying about last</p> <p>13 fall, and I think you used the word "traumatized"</p> <p>14 by that experience, is it that you were traumatized</p> <p>15 by the experience of being in college during --</p> <p>16 starting your freshman year of college during a</p> <p>17 pandemic or what was it that was traumatic about</p> <p>18 that experience?</p> <p>19 A. The traumatizing parts were all of</p> <p>20 the -- the things that I had to do because I was in</p> <p>21 college during the pandemic.</p> <p>22 Q. Your testimony about your -- whether or</p> <p>23 not you will attend IUPUI in August depending on</p> <p>24 how the injunction comes out, do you agree with me</p>	<p style="text-align: right;">Page 66</p> <p>1 that it's entirely your choice whether or not you</p> <p>2 attend IUPUI in August?</p> <p>3 A. Yes.</p> <p>4 Q. Give me just one sec.</p> <p>5 When you wear a mask at Marshalls, is</p> <p>6 that traumatic?</p> <p>7 A. No.</p> <p>8 Q. When you had to wear a mask at Amazon,</p> <p>9 was that traumatic?</p> <p>10 A. No.</p> <p>11 Q. When you were volunteering for testing</p> <p>12 while you were working at Amazon, was that</p> <p>13 traumatic?</p> <p>14 A. No.</p> <p>15 MS. RICCHIUTO: I think that's all I have for</p> <p>16 you, Natalie.</p> <p>17 MS. SIEBERT: Natalie, I have just one</p> <p>18 follow-up to the follow-up.</p> <p>19 FURTHER EXAMINATION</p> <p>20 BY MS. SIEBERT:</p> <p>21 Q. I believe that Anne just asked you if</p> <p>22 you understood that it was entirely your choice</p> <p>23 whether or not to attend IUPUI this fall, and you</p> <p>24 said it was. Correct?</p>
<p style="text-align: right;">Page 67</p> <p>1 A. Yes.</p> <p>2 Q. Other than IU's mandates surrounding the</p> <p>3 vaccine and the extra requirements, is there any</p> <p>4 other factor that will form the basis of your</p> <p>5 decision on whether to attend or not?</p> <p>6 A. Yes. The main reason that I really want</p> <p>7 to attend IU is because I'm a direct admit to the</p> <p>8 Kelley School of Business, and I worked very hard</p> <p>9 to be a direct admit there. So, that's what's</p> <p>10 really keeping me fighting. I do really want to go</p> <p>11 to IU for the Kelley School of Business.</p> <p>12 Q. Let me ask. Absent the IU's mandates</p> <p>13 surrounding the vaccines and the masking and the</p> <p>14 testing, would you be attending definitely IUPUI in</p> <p>15 the fall?</p> <p>16 A. Yes.</p> <p>17 MS. SIEBERT: Okay. That's it for me.</p> <p>18 FURTHER EXAMINATION</p> <p>19 BY MS. RICCHIUTO:</p> <p>20 Q. Natalie, do you believe that if this</p> <p>21 injunction is not granted that IU will rescind your</p> <p>22 direct admission to the Kelley School?</p> <p>23 A. I'm sorry.</p> <p>24 Q. Yeah, sure. I made that complicated</p>	<p style="text-align: right;">Page 68</p> <p>1 with the legalese in it. Let me try again.</p> <p>2 Has IU told you for any reason that your</p> <p>3 direct admission to the Kelley School is at risk?</p> <p>4 A. No.</p> <p>5 Q. So, if you want to take your direct</p> <p>6 admit spot to the Kelley School in August, you are</p> <p>7 free to do that. Correct?</p> <p>8 A. No. Since I was a direct admit at IU</p> <p>9 Bloomington but I am now transferring to IUPUI, I</p> <p>10 would have to apply again in the fall semester to</p> <p>11 get into Kelley at IUPUI.</p> <p>12 Q. Do you mean if you don't go to school in</p> <p>13 August?</p> <p>14 A. Yes.</p> <p>15 Q. I'm getting confused.</p> <p>16 So, Natalie, you're enrolled for</p> <p>17 classes, right, in IUPUI for August, correct?</p> <p>18 A. Yes.</p> <p>19 Q. And you are -- from IU's perspective,</p> <p>20 you are welcome to go and attend those classes,</p> <p>21 correct?</p> <p>22 A. Yes.</p> <p>23 Q. What circumstances would have to happen</p> <p>24 for you to have to reapply to Kelley?</p>

<p style="text-align: right;">Page 69</p> <p>1 A. I have to reapply to Kelley anyway</p> <p>2 because the classes at IU Bloomington and the</p> <p>3 classes at IUPUI are slightly different. So,</p> <p>4 there's one more class I need to take this fall for</p> <p>5 me to get back into Kelley at IUPUI.</p> <p>6 Q. Okay. So, you've already given up your</p> <p>7 direct admit spot at Kelley --</p> <p>8 A. I did not --</p> <p>9 Q. -- by deciding to transfer, is that</p> <p>10 right?</p> <p>11 A. I did not give up my spot.</p> <p>12 Q. Okay. When you attended Bloomington</p> <p>13 last fall in August, did you attend as a direct</p> <p>14 admit to Kelley?</p> <p>15 A. Yes.</p> <p>16 Q. Did there come a time where you ceased</p> <p>17 being a direct admit to Kelley?</p> <p>18 A. I was not aware that I would have to</p> <p>19 reapply to Kelley when I transferred to IUPUI. So,</p> <p>20 I moved home and I decided to transfer to IUPUI,</p> <p>21 and then I found out that I would have to reapply.</p> <p>22 It doesn't just transfer right over to IUPUI.</p> <p>23 Q. So, your decision to move home in</p> <p>24 November did not impact your Kelley status,</p>	<p style="text-align: right;">Page 70</p> <p>1 correct?</p> <p>2 A. Yes. I was still in Kelley my whole</p> <p>3 entire freshman year of college.</p> <p>4 Q. So, it was your decision sometime after</p> <p>5 the conclusion of the semester that you would</p> <p>6 resume this fall in Indianapolis that caused your</p> <p>7 Kelley status to change. Do I finally have that</p> <p>8 right?</p> <p>9 A. It's not completely right. I had to</p> <p>10 apply as a transfer student around the wintertime,</p> <p>11 winter-springtime of my second semester of my</p> <p>12 freshman year. So, because I knew that I was -- I</p> <p>13 was wanting to go to IUPUI for my sophomore year.</p> <p>14 So, I applied. And I later found out that I would</p> <p>15 have to reapply since it's a different IU campus.</p> <p>16 Q. When did you apply to transfer to IUPUI?</p> <p>17 A. Sometime between January and March.</p> <p>18 Q. Did you attend classes, Bloomington</p> <p>19 classes, during the spring semester in January and</p> <p>20 March?</p> <p>21 A. Yes.</p> <p>22 Q. And you did that at home. But</p> <p>23 physically from home?</p> <p>24 A. Yes.</p>
<p style="text-align: right;">Page 71</p> <p>1 Q. And where is home, Natalie?</p> <p>2 A. Plainfield, Indiana.</p> <p>3 Q. Okay. So, your decision sometime in</p> <p>4 January -- between January and March to transfer to</p> <p>5 IUPUI, that predates this lawsuit, correct?</p> <p>6 A. Yes.</p> <p>7 Q. And that predates any information that</p> <p>8 you had about any of the policies that are being</p> <p>9 challenged in the lawsuit, correct?</p> <p>10 A. Yes.</p> <p>11 Q. Because I think they weren't announced</p> <p>12 until like May. Does that sound right?</p> <p>13 A. Yes.</p> <p>14 Q. Okay.</p> <p>15 MS. RICCHIUTO: I think that's all that I</p> <p>16 have.</p> <p>17 MS. SIEBERT: I don't have any follow-up to</p> <p>18 the follow-up to the follow-up or wherever we're at</p> <p>19 on the follow-ups. Thank you, Natalie, for your</p> <p>20 time.</p> <p>21 THE WITNESS: Thank you, guys.</p> <p>22 MS. RICCHIUTO: Yes, thank you, Natalie.</p> <p>23 (Time noted: 12:41 p.m.)</p> <p>24 FURTHER DEPONENT SAITH NAUGHT</p>	<p style="text-align: right;">Page 72</p> <p>1 I, CORINNE T. MARUT, C.S.R. No. 84-1968,</p> <p>2 Registered Professional Reporter and Certified</p> <p>3 Shorthand Reporter, do hereby certify:</p> <p>4 That previous to the commencement of the</p> <p>5 examination of the witness, the witness was duly</p> <p>6 sworn to testify the whole truth concerning the</p> <p>7 matters herein;</p> <p>8 That the foregoing deposition transcript</p> <p>9 was reported stenographically by me, was thereafter</p> <p>10 reduced to typewriting under my personal direction</p> <p>11 and constitutes a true record of the testimony</p> <p>12 given and the proceedings had;</p> <p>13 That the said deposition was taken</p> <p>14 before me at the time and place specified;</p> <p>15 That the reading and signing by the</p> <p>16 witness of the deposition transcript was agreed</p> <p>17 upon as stated herein;</p> <p>18 That I am not a relative or employee or</p> <p>19 attorney or counsel, nor a relative or employee of</p> <p>20 such attorney or counsel for any of the parties</p> <p>21 hereto, nor interested directly or indirectly in</p> <p>22 the outcome of this action.</p> <p>23</p> <p>24</p> <p>14 CORINNE T. MARUT, Certified Reporter</p> <p>15</p> <p>16 (The foregoing certification of this</p> <p>17 transcript does not apply to any</p> <p>18 reproduction of the same by any means, unless under</p> <p>19 the direct control and/or supervision of the</p> <p>20 certifying reporter.)</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>

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1 INSTRUCTIONS TO WITNESS

2
3 Please read your deposition over
4 carefully and make any necessary corrections. You
5 should state the reason in the appropriate space on
6 the errata sheet for any corrections that are made.

7 After doing so, please sign the errata
8 sheet and date it.

9 You are signing same subject to the
10 changes you have noted on the errata sheet, which
11 will be attached to your deposition.

12 It is imperative that you return the
13 original errata sheet to the deposing attorney
14 within thirty (30) days of receipt of the
15 deposition transcript by you. If you fail to do
16 so, the deposition transcript may be deemed to be
17 accurate and may be used in court.

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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF INDIANA
3 FORT WAYNE DIVISION

4 RYAN KLAASSEN, et al.,)
5)
6 Plaintiffs,)
7) CASE NO.
8 -vs-) 1:21-cv-00238
9)
10 THE TRUSTEES OF INDIANA)
11 UNIVERSITY,)
12)
13 Defendant.)

14 AFFIDAVIT

15 I, NATALIE GRACE SPERAZZA, the
16 undersigned affiant, being first duly sworn, on
17 oath say that the testimony given at my deposition
18 at the time and place aforesaid is the truth, the
19 whole truth, and nothing but the truth, and that I
20 have read the foregoing transcript consisting of
21 Pages 1 to 76 inclusive, and do subscribe and make
22 oath that the same is a true, correct, and complete
23 transcript of my deposition so given as aforesaid,
24 and includes changes, if any, so made by me.

FURTHER AFFIANT SAITH NAUGHT.

18 AFFIANT, NATALIE GRACE SPERAZZA

19
20 SUBSCRIBED AND SWORN TO before me
21 this day of , A.D. 20 .

22
23 Notary Public
24

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1 LAWYER'S NOTES

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